



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

IN THE MATTER OF THE SEARCH OF:	)	
Holiday Inn Express, Building 12015,	)	3:21-sw- 142
Room 4173, Mahone Ave, Fort Lee, VA 23801	)	
	)	
	)	
	)	

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Kevin L. Johnson, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. Your affiant is a law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

2. I, the undersigned, have over twenty years of law enforcement experience stemming from employment as a police officer with the Henrico County Police Division. Currently, I am a duly appointed Task Force Officer with the Federal Bureau of Investigation (FBI) and have been so since August 2017. I am assigned to the Richmond FBI's Central Virginia Violent Crimes Task Force where my duties include investigating bank robberies, extraterritorial offenses, armored car robberies, kidnappings, armed carjackings, and theft of government property. I have investigated numerous criminal violations and have obtained arrest and search warrants that have culminated in the successful prosecutions of their respective offenders. The crimes I investigate are violent in nature and usually involve two or more

individuals. I am familiar with the methods violent offenders use to conduct their illegal activities, including, but not limited to, their communication methods, use of additional co-conspirators, and reoccurring method of operation.

**PURPOSE OF THE AFFIDAVIT**

4. Based on the information obtained by me, including information relayed to me by other Special Agents of other federal agencies, and other sources to this investigation, there is probable cause to believe there is kept and concealed within the premises described as follows (the “**TARGET ADDRESS**”):

hotel room 4173, which is located at Holiday Inn Express, Building 12015, Mahone Ave, Fort Lee, VA 23801. The premises to be searched is further described and located in a building that is in a seven-story red brick hotel, and room 4173 is located on the fourth floor of the hotel and is identified with the number “4173” on the wall adjacent to the door.

fruits, instrumentalities, contraband, and evidence of a violation of Title 18, United States Code, Section 113(a)(4) (assault by striking, beating, or wounding within the special maritime and territorial jurisdiction of the United States).

5. The location to be searched is described in more detail in Attachment A. The evidence to be seized is described in Attachment B.

6. This affidavit is intended to show only that there is sufficient probable cause for the requested search warrant and does not set forth all of my knowledge about this matter. The information provided is based upon my personal knowledge, or that of other sworn law enforcement officers participating in this investigation, as well as evidence obtained during this investigation.

**RELEVANT STATUTORY PROVISIONS**

7. **Assault by Striking, Beating or Wounding.** 18 U.S.C. § 113(a)(4) provides that it is unlawful for any person to commit an assault by striking, beating, or wounding within the special maritime and territorial jurisdiction of the United States.

**BACKGROUND OF INVESTIGATION**

8. The United States, through the FBI's Central Virginia Violent Crimes Task Force (CVVCTF), is conducting a criminal investigation of Mohammad Yameen MUKHTAR in relation to an assault by striking, beating, or wounding within the maritime and territorial jurisdiction, in violation of Title 18 U.S.C. § 113(a)(4).

9. On September 20, 2021, at approximately 11:04 a.m. eastern standard time, Fort Lee Army Law Enforcement Military Police responded to the Holiday Inn located at 12015 Mahone Ave, room 4173, Fort Lee, Virginia, in reference to a domestic assault. Your affiant received the information from Fort Lee Police Detective Brian E. Michaels, who was the liaison for Military Police who conducted the investigation and interview with the victim, S.H.

10. S.H. stated that her husband, Mohammad Yameen MUKHTAR, was upset with her due to MUKHTAR's brother having to stand at a meeting while she was seated. After the meeting had concluded, S.H. and MUKHTAR proceeded back to their room 4173 at the Holiday Inn.

11. Once inside the room, MUKHTAR intentionally struck S.H. an unknown number of times with a cellular phone charger, hit her with a closed fist, kicked her, and cut her wrists with a razor blade.

12. S.H. waited for MUKHTAR to leave the room to report the incident.

13. S.H. was evaluated, treated, and subsequently transported to Southside Regional Medical Center. S.H. injuries consisted of bruising around her throat, chest, face and laceration to her left arm.

14. Photographs of S.H.'s injuries were taken. Your Affiant has reviewed the photographs, and the photographs depict bruising around her throat, chest, face, and cuts on her arm.

15. S.H. audio recorded part of the assault on a cell phone. Subsequently, S.H. provided a copy of the audio recording to law enforcement. Your affiant has reviewed the audio recording, and although the two individuals heard in the recording – one female and one male – are speaking in a foreign language, the female can be heard crying and whimpering in the recording and there are whipping and/or slapping sounds.

16. Fort Lee, where the assault occurred, is within the special maritime and territorial jurisdiction of the United States.

17. On September 20, 2021, the FBI effectuated a probable cause arrest of MUKHTAR and transported him to Pamunkey Regional Jail in Hanover, Virginia, where he is currently being held.

18. Since the evening of September 20, 2021, when MUKHTAR was arrested, military police have secured Room 4173 and have prevented anyone from entering the room. Because the room is currently unoccupied and under the watch of military police, good cause exists to conduct the search warrant at any time in the day or night.

**CONCLUSION**

19. Based on the foregoing, there is probable cause to believe that the federal criminal statute cited herein has been violated, and that the contraband, property, evidence, fruits and instrumentalities of that offense, more fully described in Attachment B, may be found at the **TARGET ADDRESS**. Accordingly, this Affiant respectfully requests that the Court issue a search warrant for the **TARGET ADDRESS**, as described in Attachment A, and authorize the seizure and search of the items described in Attachment B.

Respectfully submitted,

Kevin L. Johnson

Kevin L. Johnson  
Task Force Officer  
Federal Bureau of Investigation

Subscribed and sworn to me telephonically on this 21<sup>st</sup> day of September 2021

/s/ EWH

Elizabeth W. Hanes  
United States Magistrate Judge

Honorable Elizabeth W. Hanes  
United States Magistrate Judge

**ATTACHMENT A**

**DESCRIPTION OF LOCATION TO BE SEARCHED**

The **TARGET ADDRESS** to be searched is hotel room 4173, which is located within a hotel, specifically, Holiday Inn Express, Building 12015, Mahone Ave, Fort Lee, VA 23801.

The Holiday Inn Express is a seven-story red brick hotel, and room 4173 is located on the fourth floor of the hotel and is identified with the number “4173” on the wall adjacent to the door.

**ATTACHMENT B**

**LIST OF ITEMS TO BE SEIZED AND SEARCHED**

The following materials, which constitute evidence of the commission of a criminal offense, contraband, the fruits of a crime, or property designed or intended for use or which is or has been used as the means of committing a criminal offense, namely a violation of Title 18, United States Code, Section 113(a)(4) (assault by striking, beating, or wounding):

1. Bloodied clothing, razors, cell phone charging cables, and any other items of evidentiary value that may have been utilized in an assault;
2. Liquid substances that appear to be blood or dried blood.